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Prepped by Candice Davis

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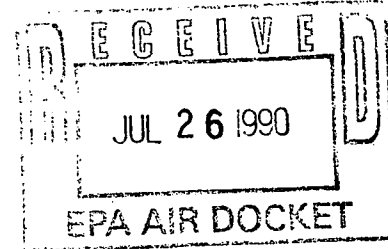
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American International Refinery, Inc.

P. O. Drawer 16866 • Lake Charles, LA 70616
(318) 439-4066

July 20, 1990

Environmental Protection Agency
Public Docket A-90-16
Room M1500
401 M. Street, S.W.
Washington, D.C. 20460



Subject: Ethyl HiTEC 3000

Gentlemen:

American International Refinery, Inc. is a regional marketer of petroleum products in Texas and Louisiana. AIRI owns a 30,000 bbl/d refinery at Lake Charles, Louisiana.

We strongly support the Ethyl Corporation's waiver application for their HiTEC 3000 octane improver additive for use in unleaded gasoline. When we initiate reformer operation, it would permit us to lower our reformer severity thus lowering the level of aromatics in our gasoline. In addition, the lower reformer severity reduces refinery emissions and conserves crude oil.

The overall benefits of HiTEC 3000, such as lower total emissions (NOX and CO) combined with the lower aromaticity will allow American International to make a cleaner burning gasoline that will be required under the new Clean Air Act.

Yours truly,

AMERICAN INT'L REFINERY, INC.

by: J. P. Chamberlain
J. P. CHAMBERLAIN
Vice President and
Chief Operating Officer

cc: Ms. Mary T. Smith
Director, Field Operations
& Support Division (EN-39F)
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